

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

2016 JAN -5 PM 3: 16

DEPUTY CLERK 

UNITED STATES OF AMERICA

v.

PAULA MCNEAL,
a/k/a "Paula Quigley"
a/k/a "Paula Walker"

No.

5 - 16CR0001-C

INFORMATION

The United States Attorney Charges:

I. INTRODUCTION

At all times pertinent to this Information:

A. The Texas Medical Assistance Program (Medicaid)

1. The Texas Medical Assistance Program (Medicaid) is a health care benefit program funded jointly by the State of Texas and the federal government which provides medical and related services to families with dependent children and aged, blind, or disabled individuals whose income and other financial and economic resources are insufficient to allow them to meet the cost of necessary medical services. Individuals enrolled in the Texas Medicaid program are referred to as "Medicaid recipients."

2. Medicaid is a "health care benefit program" which affects interstate commerce.

3. The Texas Health and Human Services Commission (HHSC) is responsible for administering the Medicaid program in the State of Texas. HHSC contracted with the National Heritage Insurance Company (NHIC) and later, its successor, Texas Medicaid and Healthcare Partnership (TMHP), to receive applications from prospective Medicaid providers, assign Medicaid provider numbers, provide information regarding Medicaid policies and regulations, and process and pay Medicaid claims.

4. An individual has to be an approved Medicaid provider to bill Medicaid for counseling and other mental health services. An individual may submit an application to TMHP and be approved as a Medicaid provider.

B. New Hope Christian Counseling (NHCC)

5. New Hope Christian Counseling (NHCC) was in the business of providing counseling services to individuals.

6. Each of the counselors at NHCC was approved as a Medicaid provider and authorized to bill Medicaid for counseling and other mental health services. The counselors at NHCC billed as a group using the Texas Provider Identifier (TPI) number for NHCC.

C. Paula McNeal

7. Defendant **Paula McNeal**, also known as Paula Quigley and Paula Walker (**McNeal**) was an employee at NHCC, whose duties were billing, including submitting the bills to Medicaid for services provided by each individual counselor at NHCC, receiving and opening mail, posting income, adjustments and receipts to counselors' accounts, and

making bank deposits.

8. Beginning on or about December 7, 2010, and continuing to on or about August 8, 2013, in the Lubbock Division of the Northern District of Texas, and elsewhere, as part of a scheme and artifice to defraud the Texas Medicaid health care benefit program which affects interstate commerce, **McNeal** falsely and fraudulently billed Medicaid for services that were not provided, using the group billing TPI number for NHCC and the individual TPI number for one of the counselors. In response to the false and fraudulent bills submitted to Medicaid, NHCC and one individual counselor were paid by checks mailed to NHCC, payments in checks to which to which NHCC and the individual counselor were not entitled.

9. It was part of the scheme and artifice to defraud a health care benefit program that **McNeal** billed for services on behalf of NHCC and one individual counselor which were never provided by NHCC or any of the counselors at NHCC.

10. It was further a part of the scheme and artifice to defraud a health care benefit program that **McNeal** deposited the approximate amount of \$104,088.45, said amount to which NHCC was not entitled, into three bank accounts, one of which she opened specifically to deposit some of the \$104,088.45, and which was solely in her control for her own personal use.

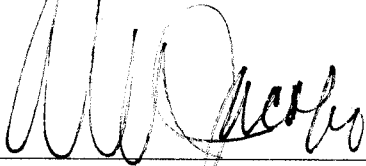
Count One
Health Care Fraud
(Violation of 18 U.S.C. § 1347)

1. The United States Attorney realleges all of the allegations contained in the Introduction of this Information.

2. From on or about December 7, 2010, and continuing to on or about August 8, 2013, in the Lubbock Division of the Northern District of Texas, and elsewhere, defendant **Paula McNeal**, also known as Paula Quigley and Paula Walker (**McNeal**), did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud the Texas Medicaid health care benefit program which affects interstate commerce, as more fully described in the allegations to the Introduction of this Information, which are incorporated by reference, by submitting false and fraudulent bills to Medicaid under the group billing TPI number of New Hope Counseling Center (NHCC) and the individual TPI number of one of the counselors for services that were not provided, which false and fraudulent bills Medicaid paid NHCC by checks that were mailed to NHCC, in the approximate amount of \$104,088.45, said amount to which NHCC was not entitled, and which **McNeal** appropriated for her own personal use.

In violation of Title 18, United States Code, Section 1347.

JOHN R. PARKER
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'Paulina M. Jacobo', is written over a horizontal line.

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